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Attorneys for Defendant  
STARBUCKS CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Sean Gunn,

Plaintiff,

v.

Starbucks Corporation;

Defendants.

Case No: C 09-05981 JSW

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND  
DISCOVERY AND EXPERT AND  
REBUTTAL EXPERT  
DISCLOSURE DEADLINES**

**WHEREAS**, the Court set November 29, 2010 as the deadline for expert disclosures under Federal Rule of Civil Procedure 26(a)(2) and December 10, 2010 as the deadline for rebuttal expert disclosures;

1       **WHEREAS**, the Court set January 18, 2011 as the deadline for discovery cut off;

2       **WHEREAS**, the parties have been diligently engaging in discovery and are currently in the  
3 process of mediation/settlement discussions;

4       **WHEREAS**, the parties stipulated to extend the deadline for expert disclosures pursuant to  
5 Federal Rules of Civil Procedure to December 30, 2010;

6       **WHEREAS**, the parties stipulated to extend the deadline for discovery to February 28,  
7 2011;

8       **WHEREAS**, Defendant Starbucks Corporation served Plaintiff its expert disclosures on  
9 December 20, 2010;

10       **WHEREAS**, the parties believe that it would be beneficial to extend the rebuttal expert  
11 disclosure and discovery cutoff deadlines while they continue to engage in mediation/settlement  
12 discussions;

13       **WHEREAS**, the parties believe that good cause exists for a short extension of the  
14 discovery deadline and date on which rebuttal expert disclosures are to be made;

15       **THEREFORE**, it is hereby stipulated and agreed by and between the parties, through their  
16 counsel of record, that the discovery cutoff deadline will be extended to February 28, 2011, and  
17 that rebuttal expert disclosures pursuant to Federal Rule of Civil Procedure 26(a) will be made  
18 no later than January 10, 2011.

19 DATED: December 27, 2010

**The Law Office of Richard J. Meechan**

By: /s/ Richard J. Meechan

Richard J. Meechan

Attorney for Plaintiff

SEAN GUNN

24 DATED: December 27, 2010

**Perkins Coie, LLP**

By: /s/ Farschad Farzan

Farschad Farzan

Attorneys for Defendant

Starbucks Corporation

1 WITH GOOD CAUSE APPEARING, IT IS SO ORDERED.

2 DATED: January 3, 2011

3   
4 Honorable Jeffrey White  
5 United States District Court Judge

6  
7 ATTESTATION PURSUANT TO GENERAL ORDER 45

8 I, Richard Meechan, attest that I obtained the concurrence of Farschad Farzan in filing this  
9 document.

10 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
11 and correct. Executed this 23rd day of December, 2010, at Santa Rosa, California.

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14 /s/ Richard J. Meechan  
15 Richard J. Meechan  
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